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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ELENA MOIS

Plaintiff,

vs.

WYNN LAS VEGAS, LLC, a Nevada Limited
Liability Company.

Defendant.

Case No.: 2:15-cv-00143-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT
AND FOR DEFENDANT'S REPLY**

[FIRST REQUEST]

It is hereby stipulated by and between the parties, through their respective counsel, that Plaintiff, ELENA MOIS, (hereinafter referred to as "Plaintiff"), shall have an extension from Monday, November 23, 2015 to and including Tuesday, December 8, 2015, in which to file her Response to Defendant's Motion for Summary Judgment. Defendant shall have until Tuesday, January 5, 2016 to file any Reply. This stipulation is submitted and based upon the following:

1. That Plaintiff's counsel has requested this extension of time and has informed Defendant's counsel that such an extension is necessary because counsel for Plaintiff has been experiencing extremely heavy workloads during the time period since the motion was filed having to conduct or defend nine (9) depositions along with numerous administrative hearings, client consultations, mediations, and preparing for and attending Early Neutral Evaluation Conferences. Plaintiff will be conducting or

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defending several other depositions in the next few weeks as well including two in Salt Lake City, Utah.

2. Additionally, Plaintiff's counsel was away for pre-planned family trips to California from October 31 to November 3 and from November 12 to November 15. And will be attending to family obligations over the Thanksgiving holiday period. Thus Plaintiff's counsel has been unable to devote the necessary time to this matter and the requested extension would be appreciated.

3. Defendant shall receive an extension through and including January 5, 2016 to file any Reply to the Opposition. Defendant's Counsel will be travelling out of state to visit family during the upcoming holiday season and with Plaintiff's extension, the Defendant should also receive additional time.

4. That this request for an extension of time for Plaintiff to file her Response to Defendant's above referenced Motion for Summary Judgment, and extension of time for Defendant to file any Reply, is made in good faith and not for purpose of delay.

DATED this 20th day of November, 2015.

/s/ James P. Kemp

James P. Kemp, Esq.

Nevada Bar No. 6375

Victoria L. Neal, Esq.

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Attorney for Plaintiff

/s/ Jen J. Sarafina

Scott M. Abbott, Esq.

Jen J. Sarafina, Esq.

Nicole A. Young, Esq.

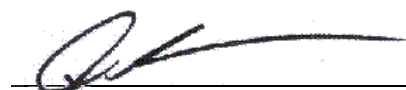
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Attorneys for Defendant

IT IS SO ORDERED



U.S. DISTRICT COURT JUDGE

Dated: November 20, 2015